

HONORABLE ROBERT J. BRYAN

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GEORGE DC PARKER II and LORI A.
PARKER,

Plaintiffs,

v.

THE SOCIETY FOR CREATIVE
ANACHRONISM, INC., a/k/a/ "SCA" or
"SCA, Inc.", et.al,

Defendant.

Case No. 3:23-cv-05069-RJB

DECLARATION OF JUSTIN E. BOLSTER
IN SUPPORT OF DEFENDANT THE
SOCIETY FOR CREATIVE
ANACHRONISM, INC.'S RESPONSE TO
PLAINTIFFS GEORGE
DC PARKER II AND LORI A. PARKER'
MOTION TO COMPEL

**NOTED ON MOTION CALENDAR:
JANUARY 19, 2024**

I, Justin E. Bolster, declare as follows:

1. I am the counsel of record representing Defendant THE SOCIETY FOR CREATIVE ANACHRONISM ("SCA") in the above-captioned matter. I am over the age of 18, competent to testify, and make this Declaration based upon my own personal knowledge and/or my review of our office's files with regard to this matter.

2. On July 8, 2023, Plaintiffs GEORGE DC PARKER II and LORI A. PARKER ("Plaintiffs") propounded upon SCA their first set of discovery requests consisted of thirty-four (34) requests for production and twenty-two (22) interrogatories, not including subparts. Upon the

1 parties' agreement for an extension of time, SCA served its responses to Plaintiffs' First Set of
2 Discovery Requests on September 8, 2023.

3 3. Attached hereto as **Exhibit A** is a true and correct copy of SCA's Responses to
4 Plaintiffs' First Interrogatories and Requests, dated September 8, 2023.

5 4. On October 8, 2023, Plaintiffs propounded upon SCA their second set of discovery
6 requests consisted of additional thirty-four (34) requests for production and twenty-two (22)
7 interrogatories, not including subparts. SCA timely responded to those requests objecting to the
8 requests exceeding those allowable under the Federal Rules of Civil Procedure. This second set of
9 discovery was essentially identical to the first set, but reduced the timeframe to January 1, 2017 to
10 present along with reducing the requests organizationally to the SCA society level and that of the
11 Kingdom of An Tir. This is largely in line with SCA's original responses, which were from January
12 1, 2018 to present and limited to the Society level and that information reasonably within the
13 possession of the crown for the Kingdom of An Tir.

14 5. A Rule 26(f) conference was held on December 13, 2023, at the request of
15 Plaintiffs. In this conference, SCA and Plaintiffs agreed to narrow the discovery scope. The
16 agreement included limiting the discovery period to after January 1, 2018, and concentrating on
17 areas pertinent to the case, specifically the Kingdom of An Tir and the SCA at the Society level.
18 Additionally, SCA committed to identifying relevant sections within previously produced
19 documents related to certain discovery requests and to process and produce any emails that include
20 Plaintiffs' names that could be reasonably identified. SEC immediately engaged in obtaining any
21 additional responsive information requested by Plaintiffs. At no time during this conference did
22 Plaintiffs indicate they would be filing the instant motion.

7. The supplemental discovery responses include identifying certain specific references in the SCA corporate documents, producing additional emails, and additional training information that is responsive to Plaintiffs' discovery requests. There will be one additional supplement that includes upwards of 400 emails that are being actively reviewed for privilege and bates numbered for identification. That supplement is expected to be produced within the next two weeks.

8. SCA is not aware of any additional discovery discussed during the Rule 26(f) conference that will require supplementation beyond the agreed-upon supplemental production that is forth coming.

I declare under penalty of perjury under the laws of the United States of America and State of Washington that the foregoing is true and correct to the best of my knowledge.

DATED this 16th day of January 2024.

PREG O'DONNELL & GILLETT PLLC

/s/ Justin E. Bolster

Justin E. Bolster, WSBA #38198
Attorney for Defendant SCA

DECLARATION OF SERVICE

I hereby declare that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record listed below:

**Counsel for Plaintiffs George DC Parker II
and Lori A. Parker:**

George DC Parker II
Lori A. Parker
10710 199th Street East
Graham, WA 98338

☐ **Via Messenger**

☐ **Via Facsimile –**

☒ **Via U.S. Mail, postage prepaid**

☐ **Via Overnight Mail, postage prepaid**

☒ **Via Court E-Service or email**

with recipient's approval

thenorsegypsyforge@gmail.com

DATED at Seattle, Washington, this 16th day of January, 2024.

/s/ Justin E. Bolster

Justin E. Bolster, WSBA #38198